

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

AUSTIN ONUSZ, CEDRIC KEES VAN
PUTTEN, NICHOLAS J. MARSHALL and
HAMAD DAR, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

WEST REALM SHIRES INC., WEST REALM
SHIRES SERVICES INC. (D/B/A FTX US),
FTX TRADING LTD., ALAMEDA
RESEARCH LLC, SAM BANKMAN-FRIED,
ZIXIAO WANG, NISHAD SINGH and
CAROLINE ELLISON,

Defendants.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 22-50513 (JTD)

Ref. No. 1

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On December 27, 2022, Plaintiffs Austin Onusz, Cedric Kees van Putten, Nicholas J. Marshall and Hamad Dar (collectively, the “Plaintiffs”) filed the *Adversary Complaint for Declaratory Judgment and Violations of Common Law* (the “Complaint”)

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

[Adv. D.I. 1] in the above-captioned adversary proceeding against, among others, West Realm Shires Inc., West Realm Shires Services Inc. (*d/b/a* FTX US), FTX Trading Ltd., Alameda Research LLC (collectively, the “Debtor Defendants”).

2. On January 5, 2023, the Plaintiffs served a copy of the Complaint on the Debtor Defendants.

3. Pursuant to rule 7012(a) of the Federal Rules of Bankruptcy Procedure, the deadline for the Debtor Defendants to answer, move or otherwise respond to the Complaint is thirty (30) days from service of the Complaint (*i.e.*, February 4, 2023) as such date falls on a Saturday the deadline automatically moves to the next business day pursuant to Bankruptcy Rule 9006(a)(1) (*i.e.*, February 6, 2023) (the “Response Deadline”).

4. The Plaintiffs and the Debtor Defendants (together, the “Parties”) have conferred and agree that the Debtor Defendants’ Response Deadline shall be extended to April 7, 2023.

5. The Parties’ stipulation is attached as Exhibit A to the proposed form of order approving the stipulation, which is annexed hereto as Exhibit 1 (the “Order”).

6. Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Order at its earliest convenience.

Dated: February 2, 2023
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Kimberly A. Brown
Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

*Counsel for the Debtors
and Debtors-in-Possession*